



November 28, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: Liberty Cablevision of Puerto Rico, Ltd. ("Liberty Cablevision")  
November 28, 2005 VoIP 911 Compliance Letter  
WC Docket No. 05-196**

Dear Ms. Dortch:

Liberty Cablevision, a cable television company providing VoIP service over its cable plant spread over part of Puerto Rico, hereby submits its Compliance Letter on the matter of reference with the required information pursuant to 47 C.F.R. §9.5(f) and the Public Notice released by the Enforcement Bureau on November 7, 2005.

1. **Percentage of Liberty Cablevision's subscribers with E911 service in compliance with the Commission's rules:**

100%

2. **A detailed statement as to whether Liberty Cablevision is transmitting all 911 calls to the appropriate authority using the selective router, the trunk lines between the selective router and the PSAP, and other necessary elements of the wireline 911 network:**

Puerto Rico maintains one designated statewide default answering point or PSAP, which is a governmental agency that receives all 911 calls, filters them and routes them to the proper emergency response entity. All Liberty Cablevision's VoIP subscribers originate 911 calls over a traditional telephone. The call goes as analog traffic to Liberty Cablevision's MTA, which converts the call to IP. The IP traffic travels over Liberty Cablevision's cable plant to a Net2Phone gateway, where it is reconverted to analog traffic and sent through Centennial Communications (LEC)' intra-Island trunking and directed to Puerto Rico Telephone Co. (ILEC)' PSTN which then routes the call to the PSAP which receives it with the ANI. As explained in more detail in answer to item no. 7, below, the registered location updated data of the VoIP subscribers of Liberty Cablevision is transmitted to the PSAP on a weekly basis by Centennial Communications. When a subscriber of Liberty Cablevision dials 911, the PSAP correlates the ANI information with the registered location in its database.

3. **The number of selective routers to which Liberty Cablevision has interconnected, directly or indirectly, as of November 28, 2005:**

None. According to Centennial, the PSAP in Puerto Rico is not accessible via selective router.

4. **If not transmitting all 911 calls to the correct answering point in areas with selective routers, a detailed explanation why not:**

N/A. See answer to item no. 3, above.

**5. Detailed statement as to whether Liberty Cablevision is transmitting the 911 caller's ANI and registered location information (ALI) to all answering points capable of receiving and processing the information:**

- a) The percentage of answering point(s) in Liberty Cablevision's service area capable of receiving and processing the ANI and registered location information, according to Centennial through Net2Phone, is 100%. See also answer to item no. 2, above.
- b) The percentage of subscribers whose ANI and registered location information is being transmitted to answering point(s) that are capable of receiving and processing the information, according to Centennial through Net2Phone is 100%. See also answer to item no. 2, above.
- c) If not transmitting ANI and registered location to all such answering point(s), a detailed description why not: N/A

**6. If not in full compliance with the VoIP 911 rules, a detailed description of status of compliance, and plans for coming into full compliance, including the anticipated timeframe:**

N/A. Notification and acknowledgment of limitations was part of customer agreement processing, prominently and in plain language. Second notice was mailed, first class, to existing subscribers with prepaid reply card. Warning stickers for devices were also mailed to existing customers and are currently delivered during installation for new customers. Separate advisory and acknowledgement is currently required at installation for all customers as part of installation procedure. Finally, e-mail notification was sent to all VoIP subscribers who also have Internet access service provided by Liberty Cablevision. Overall, Liberty Cablevision believes it is in full compliance with the VoIP 911 rules of the Commission.

**7. A detailed description of all actions Liberty Cablevision has taken to obtain each existing subscriber's current registered location, and each new subscriber's initial registered location:**

Liberty Cablevision's VoIP service is not nomadic. Instead, it is designed and marketed as a fixed voice service. Subscribers' current registered location is obtained either when the service is requested for installation at subscriber's location, or as an added service to cable television and/or Internet access service at subscriber's location. When changing location, as with the cable television service, subscriber must call Liberty Cablevision through their existing phone to change their service address if desiring to continue the service(s), including VoIP, assuming that the new location falls within Liberty Cablevision's area of coverage for cable television. In order to change a customer service address, Liberty will initiate a truck roll to the customer's existing address in order to disconnect them and will initiate another truck roll to connect them at their new address. Liberty submits all service address changes to its underlying service providers such as Net2Phone and Centennial Communications. Centennial then submits all such changes to the PSAP on a weekly basis.

**8. The methods offered to subscribers to update their registered location, including a statement as to whether Liberty Cablevision is offering at least one option for updating their registered location that permits the subscriber to use the same equipment used to access the VoIP service (e.g., their telephone):**

N/A. See answer to item no. 7, above.

9. **Any E911 solutions planned or being implemented by Liberty Cablevision for nomadic VoIP services.**

N/A. See answer to item no. 7, above.

10. **Whether and how the provider has implemented any automatic detection mechanism that enables the provider to identify when a subscriber has moved his VoIP service to a new location and ensures that the subscriber continues to receive 911 service.**

N/A. See answer to item no. 7, above.

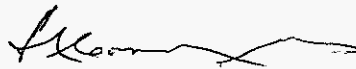
11. **Whether the provider has a commitment not to accept new VoIP subscribers in areas where the provider cannot provide 911 service, and whether the provider has a "grandfather" process for existing customers for whom the provider has not yet implemented full 911 service or automatic detection capability:**

N/A.

12. **If the provider has not implemented automatic detection mechanisms, etc., a description of the measures the provider has implemented to comply with the VoIP 911 rules.**

N/A.

Should you have any questions with regard to the above information please do not hesitate to contact me at your convenience.



John F. Conrad, Esq.  
Regulatory Compliance Manager  
P.O. Box 140759  
Arecibo, PR 00614  
[jconrad@libertypr.com](mailto:jconrad@libertypr.com)

c: Byron McCoy  
Kathy Berthot  
Janice Myles  
[fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)